

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

**JOHN HOBON,
individually and on behalf of
all others similarly situated,**

Plaintiff,

CASE NO. 17-cv-947-slc

v.

**PIZZA HUT OF SOUTHERN WISCONSIN, INC.
d/b/a PIZZA HUT, *et al.*,**

Defendants.

NOTICE OF SETTLEMENT AND REQUEST FOR A FAIRNESS HEARING

Plaintiff John Hobon, on behalf of himself and all others similarly-situated, (“Plaintiffs”) and Pizza Hut of Southern Wisconsin, Inc. d/b/a Pizza Hut, Rockford Pizza, LLC, MSG Delco, LLC, Pizza Hut of Madison, Inc., Pizza Hut of Rock County, Inc., Divo Enterprises, Inc., Pizza Hut of Waunakee, Inc., Pizza Hut of Platteville, Inc., Pizza Hut of Mauston, LLC, and Southing Grange, Inc., (“Defendants”), through their respective undersigned counsel, jointly file this Notice of Settlement and Request for a Fairness Hearing.

1. On March 14, 2019, the Parties, after engaging in arms’ length negotiations, were able to successfully resolve Plaintiff’s claims, on behalf of himself and others similarly situated, as well as on behalf of delivery drivers who worked

for Defendants between December 20, 2014 and March 14, 2019 who signed agreements to arbitrate with Defendants;

2. The Parties are working to jointly reduce the settlement to writing, obtain signatures on the settlement agreement, and draft additional documents to obtain Court approval of the settlement agreement;

3. The Parties anticipate obtaining the required signatures on the settlement agreement and filing their Joint Motion for Preliminary Approval of the Settlement and supporting documents for the Court's approval no later than May 31, 2019;

4. The Parties anticipate providing a 60-day notice period for putative class members to exclude themselves from the Rule 23 Wisconsin Class Settlement, to join the collective action, or to object to the settlement, from the date of mailing a Notice of Collective and Class Action Settlement; and

5. Accordingly, the Parties respectfully request that the Court:

(a) Set a deadline of May 31, 2019 for the Parties to file their Joint Motion for Preliminary Approval of Collective and Class Action Settlement;

(b) Set a Fairness Hearing, subject to the Court's availability, seventy-five (75) days following the date of the Court's preliminary approval order, or as soon as possible thereafter, for final approval of the settlement agreement; and

(c) Stay all other deadlines in this matter while the Parties finalize the settlement.

Dated, this 8th day of April, 2019.

Respectfully submitted,

Godfrey & Kahn, S.C.
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Respectfully submitted,

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